

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

Hearing Date: March 20, 2024 at 10:00 a.m.
Obj. Deadline: March 8, 2024 at 11:59 p.m.

Re: Docket No. 8949

**LAVANDA SANDS, L.L.C.’S JOINDER IN OBJECTION OF
FONDATION SERENDIPITY, FONDATION ELEMENTS, SERENDIPITY
NETWORK LTD AND LIQUIDITY NETWORK LTD TO THE FTX DEBTORS’
MOTION TO ESTIMATE CLAIMS BASED ON DIGITAL ASSETS**

Lavanda Sands, L.L.C. (“Lavanda Sands”), by and through its undersigned counsel, hereby files this Joinder (this “Joinder”) in the *Objection of Fondation Serendipity, Fondation Elements, Serendipity Network Ltd and Liquidity Network Ltd to the FTX Debtors’ Motion to Estimate Claims Based on Digital Assets* [D.I. 8949] (the “Objection”) to the *Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the “Estimation Motion”). In support of this Joinder, Lavanda Sands avers as follows:

1. Lavanda Sands is a creditor of Debtors FTX Trading Ltd., Alameda Research Ltd and Cottonwood Grove Ltd. Lavanda Sands acquired its claims from Fondation Elements and Liquidity Network Ltd. as reflected on *Transfer of Claim Other than For Security* [D.I. 3648] and *Transfer of Claim Other than For Security* [D.I. 3649], respectively.

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. Lavanda Sands joins in the positions and arguments set forth by Fondation Serendipity, Fondation Elements, Serendipity Network Ltd and Liquidity Network Ltd in the Objection.

WHEREFORE, Lavanda Sands respectfully requests that this Honorable Court sustain the Objection and deny the Estimation Motion, and for any such other relief as this Court may find just and equitable.

Dated: March 9, 2024
Wilmington, Delaware

BIELLI & KLAUDER, LLC

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